

ROBERT M. RICH  
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Attorney for Creditor, Xspand for FUNDCO

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In Re: : UNITED STATES BANKRUPTCY COURT  
: DISTRICT OF NEW JERSEY  
PEARLENE BURCH, : CHAPTER 13  
: CASE NO: 08-21002-JHW  
:  
Debtor. : NOTICE OF MOTION

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TO: Isabel C. Balboa  
Chapter 13 Standing Trustee  
Cherry Tree Corporate Center  
535 Route 38-Suite 580  
Cherry Hill, NJ 08002

DAVID PAUL DANIELS, P.A.  
3300 Federal Street  
Camden NJ 08105

MADAM AND SIR:

PLEASE TAKE NOTICE that the undersigned, attorney for  
TIAGI, Inc., assignee of Xspande for FUNDCO, shall apply  
before the Hon. Judith H. Wizmur, Judge of the United States  
Bankruptcy Court, on July , 2013 at the United States  
Bankruptcy Court, Camden, New Jersey, for an Order directing  
the Clerk of the Court to pay to TIAGI, Inc. for Xspande for

FUNDCO the amount of \$16,031.31, which funds have been deposited by the Standing Trustee as undistributed funds.

The undersigned will rely upon the Certification of Stephen H. Rosen with regard to this application.

/S/Robert M. Rich  
ROBERT M. RICH  
Attorney for TIAGI, Inc.  
Xspand for FUNDCO